

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

PERFECT BARRIER, L.L.C., an Indiana LLC,)	
)	
)	
Plaintiff,)	
v.)	Cause No.: 3:07CV0103 RL-CAN
)	
WOODSMART SOLUTIONS, INC. , a)	
Florida corporation,)	
)	
Defendant,)	
<hr style="width: 30%; margin-left: 0;"/>)	
)	
WOODSMART SOLUTIONS, INC.,)	
)	
Counter-Plaintiff and)	
Third-Party Plaintiff,)	
)	
v.)	
)	
PERFECT BARRIER,)	
)	
Counter-Defendant,)	
)	
And JOHN K. BANKS and)	
WILLIAM P. BANKS,)	
)	
Third-Party Defendants.)	
<hr style="width: 35%; margin-left: 0;"/>)	

**CERTIFICATION REGARDING INFORMAL DISCOVERY CONFERENCE TO
SETTLE DISCOVERY DISPUTE OVER WOODSMART’S
DESIGNATION OF CONFIDENTIAL DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c) and N.D. Ind. L. R. 37.1 Plaintiff, Perfect Barrier LLC (“Perfect Barrier”) hereby certifies that it has conferred in good faith with Defendant WoodSmart Solutions, Inc. (“WoodSmart”) in an attempt to resolve without court intervention Perfect Barrier’s objections to WoodSmart’s blanket designation of documents as “Attorneys-Eyes-Only.” The Parties first conferred via the exchange of electronic mail. Paul Peralta

(counsel for Perfect Barrier) sent a message on January 30, 2008 to Stefan Stein (counsel for WoodSmart) requesting that WoodSmart reconsider its over-broad Attorney-Eyes-Only designations. Mr. Stein replied on February 7, 2008 indicating that WoodSmart would not reconsider its designations unless and until Perfect Barrier challenged the designations on an individual basis. Perfect Barrier subsequently attempted to confer with WoodSmart via letter sent by Mr. Peralta on February 14, 2008 to Mr. Stein, and copied to Michael J. Colitz and Steffanie N. Garrett (counsel for WoodSmart), Tonya L. Mitchell (counsel for Perfect Barrier), and Lynn Holder (paralegal for Perfect Barrier). On February 25, 2008, after receiving no response from WoodSmart, Perfect Barrier made another attempt to confer via electronic mail sent by Mr. Peralta to Mr. Stein and copied to Ms. Mitchell and Ms. Holder. To date, the Parties have not been able to resolve this dispute.

This the 14th day of March, 2008.

Respectfully submitted,

s/ Paul J. Peralta
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ATTORNEYS FOR PLAINTIFF PERFECT
BARRIER, L.L.C., and THIRD-PARTY
DEFENDANTS JOHN K. BANKS, and WILLIAM
P. BANKS

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the **CERTIFICATION REGARDING INFORMAL DISCOVERY CONFERENCE TO SETTLE DISCOVERY DISPUTE OVER WOODSMART'S DESIGNATION OF CONFIDENTIAL DOCUMENTS** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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This the 14th day of March, 2008.

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